

UNITED STATES BANKRUPTCY COURT
DISTRICT OF SOUTH DAKOTA

In Re:) Bankr. No. 11-50289
) Chapter 7
RONALD DEAN FOSTER)
aka Ronald D. Foster) MOTION FOR TURNOVER
aka Ron Foster)
aka Ron D. Foster)
SSN/ITINxxx-xx-5560)
)
Debtor.)

Chapter 7 Trustee ("Trustee") moves for turnover of property to the chapter 7 estate, and in support of the Motion states that:

1. Ronald Dean Foster ("Debtor") filed a petition for relief under Chapter 7 on June 29, 2011.
2. This motion is filed pursuant to 11 U.S.C. §521(4).
3. This Court has jurisdiction pursuant to 28 U.S.C. §§1334 and 157.
4. Debtor scheduled a 1941 Knucklehead Motorcycle at a value of \$800.00 and claimed exemption value in the vehicle of \$800.00. Trustee is informed and believes the motorcycle would sell at public auction for between \$5,000.00 and \$10,000.00.
5. Debtor scheduled accrued wages of an unknown value and claimed exemption value of \$0. Trustee has estimated Debtor was owed accrued wages at filing of \$813.00.
6. Debtor scheduled a 350 motor at a value of \$200.00 and exempted value in the asset of \$100.00.

Trustee requests that Debtor be ordered to turn over:

1. The 1941 Knucklehead Motorcycle to be sold at public auction subject to Debtor's exemption claim;
2. The sum of \$913.00 representing accrued wages and the motor equity of \$100.00 not claimed exempt.

September 9, 2011

/s/ John S. Lovald

John S. Lovald

Chapter 7 Trustee

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